

## STAFF SUMMARY SHEET

	TO	ACTION	SIGNATURE (Surname), GRADE AND DATE		TO	ACTION	SIGNATURE (Surname), GRADE AND DATE
1	CES/CD	Coord	On leave 14-27 Oct 03	6	MSG/CC	Cccrd	FS 300 / Campbell 3 Nov
2	CES/CC	Coord	<i>[Signature]</i> 16 Oct 03	7	RQW/KCEA	Review	<i>[Signature]</i> 4 Nov
3	RQW/JA	Coord	<i>[Signature]</i> 23 Oct 03	8	RQW/KCS	Review	<i>[Signature]</i> 5 Nov 03
4	RQW/SE	Coord	<i>[Signature]</i> 28 Oct 03	9	RQW/CCE	Review	<i>[Signature]</i> 5 Nov 03
5	RQW/PA	Coord	<i>[Signature]</i> 30 Oct 03	10	RQW/CV	Sign	<i>[Signature]</i> 11

SURNAME OF ACTION OFFICER AND GRADE

SYMBOL

PHONE

TYPIST'S INITIALS

SUSPENSE DATE

Lee, GS-12

CES/CEVA

7-5881

gwl

## SUBJECT

Approval of Release of Draft Environmental Documents -- Construct Consolidated Base Support Center -- for Public Review

DATE

6 Oct 03

## SUMMARY

- Tab 1 is the Draft Finding of No Significant Impact (FONSI) for the Construct Consolidated Base Support Center project. Tab 2 is the Draft Environmental Assessment (EA) for the same project. Tab 3 is the news release for the same project.
- As per 32 Code of Federal Regulations (CFR) 989, The Environmental Impact Analysis Process, the Staff Judge Advocate and the Public Affairs Office should review the attached Environmental Impact Analysis Process (EIAP) documents for legal sufficiency and public affairs issues.
- As per 32 CFR 989, a public review period, including notification of local governments and the Georgia State Clearinghouse and consultation with appropriate state and federal agencies, must be conducted on all draft FONSI and EAs. All comments received during this review period must be addressed in the final EA for the project.
- As per 32 CFR 989, the release of environmental documents for review by the public and the approval of final environmental documents by the Chairman of the Environmental Protection Committee do not obligate the Air Force in any way to conduct the proposed action or any of the alternatives. The purpose of the EA and FONSI is merely to document that environment impacts were considered prior to implementation of any federal action.
- As per 32 CFR 989, RQW/CV is authorized, as Chairman of the Environmental Protection Committee, to authorize the release of the draft unsigned FONSI and EA for public review and comment.
- RECOMMENDATION: RQW/CV approve the release of the draft FONSI and EA for public review and comment by signing SSS where indicated.

*[Signature]*

JOHN B. MITCHELL  
Environmental Flight Chief

## Tabs

1. Finding of No Significant Impact (FONSI)
2. Environmental Assessment (EA)
3. News Release

Report Documentation Page				Form Approved OMB No. 0704-0188	
Public reporting burden for the collection of information is estimated to average 1 hour per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to Washington Headquarters Services, Directorate for Information Operations and Reports, 1215 Jefferson Davis Highway, Suite 1204, Arlington VA 22202-4302. Respondents should be aware that notwithstanding any other provision of law, no person shall be subject to a penalty for failing to comply with a collection of information if it does not display a currently valid OMB control number.					
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## **CONSTRUCT CONSOLIDATED BASE SUPPORT CENTER**

### **FINDING OF NO SIGNIFICANT IMPACT (FONSI)**

#### **1.0 DESCRIPTION OF THE PROPOSED ACTION AND ALTERNATIVES**

##### **1.1 Proposed Action**

Moody Air Force Base (AFB) proposes to construct a Consolidated Base Support Center that will house most wing functions including Wing Headquarters, Mission Support Group Headquarters, Mission Support Squadron, Military and Civilian Personnel, Area Defense Counsel, and Law Center. The purpose of this action is to house all the administrative staff and working officers in a central, energy efficient facility to ensure effective coordination and control of related command functions. Currently, these base functions are located in seven undersized disjunct facilities, which leads to administrative inefficiency. Additionally, six of the seven facilities date back to the World War II era while the other dates back to the 1960s. The age of these facilities results in high maintenance costs, both in man-hours and material, and high energy costs due to old and inefficient heating, ventilation, and air conditioning (HVAC) systems. These seven facilities would be demolished as part of the proposed action. The Consolidated Base Support Center will contain state-of-the-art equipment, will be sized appropriately to house these base functions, and will increase efficiency by consolidating headquarters and administrative support functions in one centrally-located facility.

##### **1.2 Alternatives**

The two alternatives to the proposed action are: 1) alternative siting and 2) the No Action Alternative.

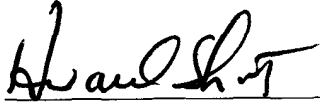
#### **2.0 SUMMARY OF ENVIRONMENTAL IMPACTS**

There would be no significant impacts to the environment as a result of implementation of the proposed action or any of the evaluated alternatives. Also, there were no significant cumulative effects noted that would occur as a result of implementation of the proposed action or any of the evaluated alternatives.

#### **3.0 CONCLUSION**

The attached EA was prepared and evaluated pursuant to the National Environmental Policy Act (Public Law 91-190, 42 U.S.C. 4321 *et seq.*) and according to AFI (Air Force Instruction) 32-7061, *The Environmental Impact Analysis Process*. I have concluded that the construction of the Consolidated Base Support Center does not constitute a "major Federal action significantly affecting the quality of the human environment" when considered individually or cumulatively in the context of the referenced act, including

both direct and indirect impacts. Therefore, no further study is required, and a Finding of No Significant Impact is thus warranted.



HOWARD SHORT, Colonel, USAF  
Chairperson, 347 RQW Environmental Protection Committee

*11 NOV 03*

Date

UNITED STATES DEPARTMENT OF DEFENSE  
DEPARTMENT OF AIR FORCE  
MOODY AIR FORCE BASE

ENVIRONMENTAL ASSESSMENT

FOR

CONSTRUCTION OF CONSOLIDATED BASE SUPPORT CENTER

February 2004

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# **CONSTRUCT CONSOLIDATED BASE SUPPORT CENTER**

## **ENVIRONMENTAL ASSESSMENT**

### **1.0 PURPOSE AND NEED FOR THE PROPOSED ACTION**

#### **1.1 Background, Purpose, and Need for the Proposed Action**

Moody Air Force Base (AFB) proposes to construct a Consolidated Base Support Center that will house most wing functions, including Wing Headquarters, Mission Support Group Headquarters, Mission Support Squadron, Military and Civilian Personnel, Area Defense Counsel, and Law Center. The purpose of this action is to house all the administrative staff and working officers in a central, energy efficient facility to ensure effective coordination and control of related command functions. Currently, these base functions are located in seven undersized disjunct facilities, which leads to administrative inefficiency. Additionally, six of the seven facilities date back to the World War II era and the other dates back to the 1960's. The age of these facilities results in high maintenance costs, both in man-hours and material, and high energy costs due to old and inefficient heating, ventilation, and air conditioning (HVAC) systems. These seven facilities would be demolished as part of the proposed action. The Consolidated Base Support Center will contain state-of-the-art equipment, will be sized appropriately to house these base functions, and will increase efficiency by consolidating headquarters and administrative support functions in one centrally-located facility.

#### **1.2 Location of the Proposed Action**

Moody Air Force Base is located in south-central Georgia about 10 miles northeast of Valdosta. The project location is on Main Base within the Austin Ellipse. No construction or demolition will occur outside the boundary of Moody AFB. Refer to Figures 1 and 2 for the general location of Moody AFB and the general location of the proposed project.

#### **1.3 Scope of the Environmental Review**

The National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations, and the Air Force (AF) implementing regulations, 32 Code of Federal Regulations (CFR) 989, *The Environmental Impact Analysis Process*, specify that an EA should focus only on those resource areas potentially subject to impacts. Resources which could potentially be impacted by the proposed action include:

- Cultural Resources
- Water Resources
- Environmental Compliance Program issues
  - o underground storage tanks (UST)
  - o asbestos-containing material (ACM)

- lead-based paint (LBP)
- residual chemical contamination
- Air Quality

The following additional resource areas were not analyzed in this document since the potential for impacts was considered to be negligible or nonexistent:

- *Land Use.* The proposed project will be designed in accordance with established land use development guidelines addressing safety, functionality, and environmental protection, and the resulting land use will remain the same as current. Accordingly, land use impacts would be negligible or nonexistent.
- *Noise.* Under the proposed action, temporary and minor increases in noise in the immediate vicinity of the project site would occur during construction and demolition activities. However, noise generated by required construction/demolition equipment and trucks, operating sporadically and during normal business hours, would represent a negligible impact relative to the ambient noise levels at Moody AFB, which are dominated by aircraft noise.
- *Transportation and Circulation.* Implementation of the proposed action would not adversely affect transportation and circulation. These resources would actually be improved through the consolidation of functions into one facility rather than seven scattered facilities.
- *Biological Resources.* The proposed project area is located within the developed portion of Main Base. Therefore, biological resources are limited to landscape plantings and common urban/suburban wildlife species. No rare, threatened, or endangered species or habitat occur within one mile of the proposed project site. Any short-term disturbances to biological resources will be off-set through landscaping of the new facility.
- *Socioeconomics and Environmental Justice.* Implementation of the proposed action would not affect socioeconomic resources and would fully comply with Executive Order (EO) 12898, *Federal Actions to Address Environmental Justice in Minority and Low-income Populations*, and EO 13045, *Protection of Children from Environmental Health Risks and Safety Risks*. The proposed action would occur within the boundaries of Moody AFB; no change in personnel levels would occur; no impacts to schools, children, or minority populations would occur; and the scale of the proposed construction/demolition expenditures would not result in noticeable direct or indirect effects to the economy. As no permanent population centers, low-income communities, or minority communities exist near the proposed project site, no communities would be exposed to adverse socioeconomic or environmental justice impacts.



## **2.0 DESCRIPTION OF PROPOSED ACTION AND ALTERNATIVES**

### **2.1 Minimum Selection Criteria**

The Air Force considered several alternatives to the Proposed Action. In the initial screening of these alternatives, the Air Force took into consideration minimum selection criteria. Only those alternatives that met these criteria were considered suitable for detailed analysis. The selection criteria were conformance to existing laws, Air Combat Command (ACC) and Department of the Air Force (AF) policy and regulations, and compatibility with the Base Master Plan. One major criteria for siting was that the consolidated support center be located centrally within the administrative areas of Main Base.

### **2.2 Detailed Description of Proposed Action**

The proposed action consists of the construction of a Consolidated Base Support Center that will house most wing functions, including Wing Headquarters, Mission Support Group Headquarters, Mission Support Squadron, Military and Civilian Personnel, Area Defense Counsel, and Law Center. The purpose of this action is to house all the administrative staff and working officers in a central, energy efficient facility to ensure effective coordination and control of related command functions. The Consolidated Base Support Center will contain state-of-the-art equipment, will be sized appropriately, and will increase efficiency by consolidating headquarters and administrative support functions in one facility.

The Consolidated Base Support Center will be a 64,971 square-foot one-story building located inside the premises of Austin Ellipse and Bradley Circle (see Figure 3). The exterior wall system will be masonry cavity wall with brick facing, and the roof will be metal standing seam system. The interior construction will generally be metal stud and gypsum wallboard partitions, with acoustical tile ceilings and carpet or vinyl flooring. The roof structure will be structural steel, and the building will meet all fire and safety codes, including an automated sprinkler system.

To comply with anti-terrorism/force protection (AT/FP) guidelines, no vehicle parking will be allowed within 35 feet of the building. Austin Ellipse will be narrowed from 40 feet wide to about 24 feet wide to provide the required AT/FP setbacks and to make pedestrian crossings from the parking areas to the facility safer. Approximately 300 parking spaces will be developed on two adjacent sites as part of the proposed action. Additionally, a small parking area will be provided in front of the Wing Headquarters for staff cars, VIPs, and guests. An additional parking area will be created for alert vehicles. Figure 3 shows the layout of the proposed facility in relation to the parking areas.

As part of the proposed action, six WWII-era buildings and one building constructed in 1981 will be demolished. These buildings are: 101, 102, 103, 104, 113, 118, and 119 (see Figure 4). The overall footprint of disturbance for the facility, including the demolition of buildings 101, 102, 103, and 104, will be about 510 feet by 180 feet

(91,800 square feet). The overall footprint of disturbance for the three parking areas will be approximately 180 feet by 240 feet (43,200 square feet), 420 feet by 120 feet (50,400 square feet), and 120 feet by 120 feet (14,400 square feet), respectively. The overall footprint of the demolition of buildings 113 and 119 would be 70,925 square feet, and the overall footprint of the demolition of building 118 would be 6,500 square feet. Based on these figures, the total project area, including the construction of the parking lots and the Consolidated Base Support Center facility and the demolition of the seven buildings, will result in the disturbance of approximately 6 acres.

While the demolition and construction activities are taking place, the affected organizations will move into temporary offices, either in existing facilities or in temporary trailers located in previously disturbed areas on the installation.

## **2.3 Alternatives**

The alternatives to the proposed action are: 1) alternative siting; and, 2) the no action alternative.

### **2.3.1 Alternative Siting**

As part of a thorough planning process, installation personnel have systematically evaluated siting constraints, operational issues, and many other factors to identify the set of acceptable project alternatives that would satisfy the purpose and need for this proposed action. Reasonable criteria applied in the analysis included land use compatibility, consolidation of similar functions, available building space, environmental constraints, compatibility with the base general plan, and required siting location (e.g. central to the base administrative area).

Potential sites for the Consolidated Base Support Center were found to be severely limited because of the current lack of open space of suitable size to house such a facility. It was determined that the only feasible alternative would be to construct the new facility in the same general location as those facilities it would be replacing. No alternative siting was possible. Consequently, only the proposed action and the No Action Alternative are analyzed in this EA.

### **2.3.2 No Action Alternative**

Under the No Action Alternative, the Consolidated Base Support Center would not be constructed, and the wing administrative functions would continue to exist in aging, substandard, disjunct facilities. The environmental impacts of this alternative will be further analyzed in this document.

### **3.0 AFFECTED ENVIRONMENT**

#### **3.1 Introduction**

The physical and biological components of the proposed project area are described in Moody AFB's Integrated Natural Resource Management Plan, and in the Moody AFB Natural Heritage Inventory Final Report. These documents are available for review in the Environmental Flight. Only information specific to the proposed project location will be discussed here.

None of the analyzed alternatives would have adverse impacts to areas of critical environmental concern, prime or unique farm land, coastal zones, wilderness areas, floodplains, wild or scenic rivers, hazardous waste or environmental restoration program (ERP) sites, archaeological remains, historic sites, or Native American religious concerns.

#### **3.2 Cultural Resources**

A Phase I Archeological Survey of the project area was accomplished as part of a base-wide survey in 1995. No significant cultural sites were recorded in the proposed project areas. The archeological site recorded nearest the area of potential effect (APE) is located about 6,900 feet southeast of the APE (Site 9LW71); this site was determined to be potentially eligible for National Register Listing. A historic building survey was conducted in 1999 by Gulf South Research, Inc., on behalf of the installation (Survey of Historic Buildings and Structures at Moody Air Force Base, Lowndes and Lanier Counties, Georgia, Gulf South Research, Inc.) Based on this survey, it was determined that the nearest historic building potentially eligible for National Register Listing is the Water Tower (Building 618), located approximately 1,430 feet east of the proposed project location. Figures 5 and 6 show the proximity of these resources to the APE.

#### **3.3 Water Resources**

The installation is located on a level plateau between the Withlacoochee River to the west and the Alapaha River to the east. Surface water, including storm water, in the proposed project area flows north into Beatty Branch, which then flows into Cat Creek and then into the Withlacoochee River. The Withlacoochee River is located within Upper Suwanee River Watershed, which drains into the Lower Suwanee Watershed and eventually into the Gulf of Mexico.

Storm water on the installation is managed by the Environmental Flight through the Storm Water Management Program and the Storm Water Pollution Prevention Plan (SWPPP). Storm water originating from the proposed project areas is routed through storm drains and pipes to Outfall 22, immediately north of the Sijan Street/Robinson Road intersection at the headwaters of Beatty Branch (Figure 7).

The proposed project areas, including the location of the seven buildings scheduled for demolition, are not included within a 100-year floodplain. There are no jurisdictional wetlands located within the boundaries of the proposed project areas.

### **3.4 Environmental Compliance Program Issues**

#### **3.4.1 Underground Storage Tanks (USTs)**

Two USTs will be impacted by the proposed action: 1) Tank 102-1, Building 102, 5109 Austin Ellipse, 1,200 gallon #2 heating oil tank; and, 2) Tank 113-1, Building 113, 5251 Berger Street, 1,000 gallon #2 heating oil tank. Figure 8 shows the location of the buildings where these tanks are located.

#### **3.4.2 Asbestos-containing Material (ACM)**

As part of normal maintenance activities, asbestos surveys were conducted for the facilities proposed for demolition. All of the buildings proposed for demolition were found to contain some type of ACM. Types of ACM identified included primarily floor tile, felt, and siding, although pipes with ACM coverings were noted in at least one facility.

#### **3.4.3 Lead-based Paint (LBP)**

Surveys indicate that lead-based paint (LBP) is present on exterior and interior painted surfaces in all the facilities proposed for demolition. Renovations and maintenance activities may have resulted in partial abatement of LBP in these facilities. However, the extent of abatement cannot be determined. Therefore, LBP is still assumed to be present in these facilities.

#### **3.4.4 Residual Chemical Contamination**

No information is available concerning the presence or absence of residual chemical contamination in the facilities scheduled for demolition. However, limited soil sampling in the Quiet Pines Housing Area indicated that residual pesticides (termiticides) were present in the soil underlying older facilities on the installation. Samples from the soil underneath the foundation of four housing units (1612B, 1612D, 1614A, 1614D) were collected through a 3-inch diameter hole drilled through the foundation. Two samples from the soil adjacent to the foundations were collected for three additional housing units (1601 -- north and south sides of unit; 1611 -- back and front of unit; 1625 -- north and south sides of unit). The presence of chlorinated pesticides in the sample was determined by testing with Environmental Protection Agency (EPA) Method 8081.

Based on this sampling effort, the termiticide aldrin and its derivatives were determined to be present around and underneath housing units in the Quiet Pines Housing Area. It is assumed that similar levels of chemical residue remain in the soil underlying all facilities on Moody AFB that were constructed prior to 1970. Therefore, in the absence of

sampling data for the buildings proposed for demolition as part of the proposed action, it will be assumed that residual amounts of aldrin and its derivatives may be present in the soil under and around these facilities.

### **3.5 Air Quality**

The Clean Air Act dictates that National Ambient Air Quality Standards (NAAQS), established by the Environmental Protection Agency, must be maintained nationwide. The NAAQS have included standards for six “criteria” pollutants: ozone, nitrogen oxide, carbon monoxide, “respirable” particulate, sulfur dioxide, and lead. Lowndes County is an attainment area for all NAAQS “criteria” pollutants. Specifically, in regards to the Clean Air Act and regulation of installation emissions, Moody AFB is not classified as a major source of criteria pollutants and does not have a Title V permit. Currently, Moody AFB operates under a Synthetic Minor Permit for Hazardous Air Pollutants (HAPs) that was issued on 31 August 1998.

## **4.0 ENVIRONMENTAL CONSEQUENCES**

### **4.1 Cultural Resources**

#### **4.1.1 Proposed Action**

The proposed location for this project is currently a previously disturbed urban/suburban area. Of the seven facilities scheduled for demolition, six of them are over 50 years of age and date back to the World War II era. However, a historic building survey conducted in 1999 (Survey of Historic Buildings and Structures at Moody Air Force Base, Lowndes and Lanier Counties, Georgia, Gulf South Research, Inc.) determined that the only facility on the installation potentially eligible for listing on the National Register of Historic Places was the water tower (Building 618), located approximately 1,430 feet east of the proposed project location (Figure 6). The proposed location for this project is a previously disturbed urban/suburban area. Based on the Phase I cultural survey, the historic building survey, and the proposed project location, intact archaeological and historic resources are not likely to be found in the proposed site. The only anticipated impact to cultural resources from this alternative results from visual changes to the landscape in the vicinity of Bldg 618, the water tower. However, as the land-use of the proposed project area will not change as a result of the proposed action, it is believed the impact will not be adverse. Therefore, there will not be any significant impacts to cultural resources as a result of implementation of this alternative. Per 36 CFR 800, the Georgia State Historic Preservation Office (SHPO) will be consulted prior to implementation.

#### **4.1.2 No Action Alternative**

There are no anticipated impacts to cultural resources as a result of implementation of this alternative.

### **4.2 Water Resources**

#### **4.2.1 Proposed Action**

The proposed action will result in a slight increase in impervious surfaces, primarily through the construction of the two main parking lots which will be located adjacent to the new facility to the north and to the south. However, this slight increase will not result in a significant increase in storm water managed by the installation. There is a slight potential for soil erosion and sedimentation resulting from the demolition and construction activities, but best management practices will be implemented to minimize erosion and to prevent sediments from leaving the site.

Because the size of the proposed disturbance area is greater than 1.0 acres, a Lowndes County Land Disturbing Permit, as required by the Georgia Erosion and Sedimentation Control Act, will be obtained. This permit requires the implementation of best

management practices to minimize erosion and to control sediments on a construction site.

Additionally, Moody AFB will file a Notice of Intent (NOI) to discharge storm water associated with construction activities under General Permit GAR1000003 as required by the National Pollutant Discharge Elimination System (NPDES) regulations of the Clean Water Act and the Georgia Water Quality Control Act (Georgia Laws 1964, p. 416, as amended). This permit requires that an Erosion, Sedimentation, and Pollution Control Plan including best management practices and monitoring of streams receiving storm water be submitted to the Georgia EPD prior to implementation of the proposed action. Following the completion of the project, a Notice of Termination (NOT) must be filed with the Georgia EPD.

Therefore, because of these regulatory requirements and the implementation of best management activities, there will be no significant impacts to water resources as a result of implementation of this alternative.

#### **4.2.2 No Action Alternative**

There will be no significant impacts to water resources as a result of implementation of this alternative.

### **4.3 Environmental Compliance Program Issues**

#### **4.3.1 Underground Storage Tanks (USTs)**

##### **4.3.1.1 Proposed Action**

The two underground storage tanks located within the proposed project areas, tank numbers 102-1 and 113-1, are both #2 heating oil tanks. These tanks are not regulated under 40 Code of Federal Regulations Part 280, Technical Standards and Corrective Action Requirements for Owners and Operators of Underground Storage Tanks (UST) or under the Georgia Environmental Protection Division (EPD) implementing regulations. Therefore, there is not a requirement to notify the state prior to removal of these tanks or to obtain a closure form following removal.

The process for removing a non-regulated tank is similar to the removal of a regulated tank. Following removal of the tank, all product must be removed from the tank and a sample of the tank cleaning rinsate must be tested to determine if it is hazardous or non-hazardous waste. Two soil samples must be obtained from the excavation site to determine if the site is contaminated. Any contaminated soil encountered during the removal of the USTs must be characterized and disposed of in accordance with existing environmental laws and regulations as part of this project. All soil displaced during the demolition and removal of the tanks will be characterized and disposed of in accordance with applicable environmental laws and regulations as part of the proposed project.

Because of these established procedures concerning the removal of non-regulated tanks and the remediation of any contaminated soil, there will not be any significant impacts to the environment relative to USTs as a result of implementation of the proposed action.

#### **4.3.1.2 No Action Alternative**

Under this alternative, the USTs would remain in place and would not be removed. Therefore, there will not be any significant impacts to the environment relative to USTs as a result of implementation of this alternative.

#### **4.3.2 Asbestos-containing Material (ACM)**

##### **4.3.2.1 Proposed Action**

Prior to the implementation of the proposed action, a comprehensive asbestos survey will be conducted to determine the type and amount of asbestos present in each facility. In accordance with the federal National Emissions Standards for Hazardous Air Pollutants (NESHAPs) regulations and Georgia Rule 391-3-14, the Georgia EPD will be notified at least 10 days prior to implementation of any action that may break up, dislodge, or similarly disturb asbestos material, including the demolition of buildings. All regulated ACM will be abated from the facilities prior to demolition, and will be disposed of in accordance with federal and state environmental regulations by a licensed abatement contractor. Because of the potential presence of ACM in these facilities, demolition workers will wear personal protective equipment (PPE) consisting of gloves, eye protection, and masks, at a minimum.

Because of these established procedures concerning the abatement and disposal of ACM and the protection of workers, there will not be any significant impacts to the environment relative to ACM as a result of implementation of the proposed action.

##### **4.3.2.2 No Action Alternative**

Under this alternative, abatement and disposal of ACM would occur during normal maintenance activities conducted on the aging facilities as required. All abatement and disposal would be conducted in accordance with applicable federal and state environmental regulations. Therefore, there would not be any significant impacts to the environment relative to ACM as a result of implementation of this alternative.

#### **4.3.3 Lead-based Paint (LBP)**

##### **4.3.3.1 Proposed Action**

Since none of the facilities proposed for demolition are child-occupied facilities, there are no abatement requirements in regards to LBP. However, construction and demolition work involving commercial or public buildings where an employee may be occupationally exposed to lead are still subject to the requirements of the federal Occupational Safety and Health Administration's (OSHA) construction industry standard



29 CFR 1926.62. This regulation requires that contractors involved in the demolition of the proposed facilities be trained and certified concerning LBP impacts and that the contractors follow work practice standards, including record-keeping, reporting, the use of personal protective equipment (PPE), and the preparation of a respiratory protection plan. All workers involved in demolition activities should wear PPE consisting of gloves, eye protection, and masks, at a minimum, and should be notified of the presence of LBP in the buildings scheduled for demolition. Construction debris from the site containing LBP will be disposed of in accordance with federal and state regulations in an approved landfill.

Since these are not child-occupied facilities and since the OSHA standards will protect contractor personnel involved in construction and demolition activities, there will not be any significant impacts to the environment relative to LBP as a result of implementation of this alternative.

#### **4.3.3.2 No Action Alternative**

Since none of the facilities in the proposed project area are child-occupied facilities, there are no abatement requirements in regards to LBP and LBP will not be removed during normal maintenance activities. Therefore, there will not be any significant impacts to LBP as a result of implementation of this alternative.

#### **4.3.4 Residual Chemical Contamination**

##### **4.3.4.1 Proposed Action**

The levels of pesticides in the soil surrounding and underlying the facilities proposed for demolition (based on sampling of soil underlying houses in the Quiet Pines Housing Area) are not considered a threat to human health or the environment. However, as a safety precaution, demolition and construction workers should wear personal protective equipment consisting of gloves and eye protection at a minimum and should be notified of the potential presence of pesticide-contaminated soils. If these practices are followed, there should not be a significant impact as a result of implementation of the proposed action.

##### **4.3.4.2 No Action Alternative**

Under this alternative, there would not be any soil disturbance or implementation of demolition activities that would result in the uncovering of contaminated soil. Therefore, there would not be any significant impacts to the environment relative to termiticides or termiticide derivatives as a result of implementation of this alternative.

## **4.4 Air Quality**

### **4.4.1 Proposed Action**

Disturbances to air resources would primarily include only those caused during the construction and demolition work. These disturbances would consist of emissions from equipment used for construction and demolition and would be of short-term duration and would not affect Moody AFB's existing synthetic minor air permit.

A review of the design specifications for the Consolidated Base Support Center must be completed prior to implementation to ensure compliance with the existing synthetic minor air permit. This review will determine whether a permit modification will be needed. Permit modifications could be triggered by the installation of boilers, emergency generators, or any specialized equipment that may be required in the facility.

However, even if permit modifications are required, there will not be any significant lasting impacts on air quality on Moody AFB or in Lowndes County as a result of implementation of this action.

### **4.4.2 No Action Alternative**

There would be no impacts to air quality as a result of implementation of this alternative.

## **5.0 Cumulative Impacts**

Council of Environmental Quality (CEQ) regulations stipulate that potential environmental impacts resulting from cumulative impacts should be considered within an environmental assessment (EA). Cumulative impacts are defined as "the incremental impacts of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency or person undertakes such other actions" (40 CFR 1508.7). Recent CEQ guidance in "Considering Cumulative Effects" affirms this requirement, stating that the first steps in assessing cumulative effects involve defining the scope of the other actions and their interrelationship with the proposed action. The scope must consider geographic and temporal overlaps among the proposed action and other actions. It must also evaluate the nature of the interactions among these actions. In accordance with NEPA, a discussion of cumulative impacts resulting from projects that are proposed, currently under construction, recently completed, or anticipated to be implemented in the near future is necessary.

There are no recently completed or ongoing projects that would be relevant to an analysis of cumulative effects for this action. Additionally, there are no known actions that have been proposed by other agencies or persons in the vicinity of the installation. Therefore, there would not be any significant cumulative effects as a result of implementation of either the proposed action or the no action alternative.

## **6.0 Permits and Approvals Required (other than public notification)**

The following permits and approvals are required prior to implementation of the proposed action:

- 1) Lowndes County Land Disturbing Permit is required from Lowndes County, Georgia, prior to any work on this project in accordance with the Georgia Erosion and Sedimentation Control Act. All requirements of this permit must be followed to ensure compliance with the act.
- 2) Notice of Intent (NOI) to discharge storm water associated with construction activities under General Permit GAR1000003 as required by the National Pollutant Discharge Elimination System (NPDES) regulations of the Clean Water Act and the Georgia Water Quality Control Act (Georgia Laws 1964, p. 416, as amended) is required. Additionally, erosion and sedimentation control structures must be inspected and maintained daily, and all required sampling in the receiving waters must be conducted in accordance with the provisions of the permit.
- 3) Per 36 CFR 800, consultation was conducted with the Georgia State Historic Preservation Division Office (SHPO) to receive their concurrence with Moody AFB's finding that this project will have no impact to cultural or historical resources.
- 4) In accordance with the federal National Emissions Standards for Hazardous Air Pollutants (NESHAPs) regulations and Georgia Rule 391-3-14, the Georgia EPD will be notified by the project manager/engineer at least 10 days prior to implementation of any action that may break up, dislodge, or similarly disturb asbestos material, including the demolition of buildings. This regulation requires notification to the state for the demolition of facilities even if asbestos is not present.

## **7.0 List of Agencies Consulted**

In accordance with 32 CFR 989, 32 CFR 989, and directives from 347 RQW/JA, the following agencies and Governmental organizations will be consulted before finalization of the EA and FONSI:

- 1) Georgia State Clearinghouse
- 2) Historic Preservation Division, Georgia DNR
- 3) Lowndes County Board of Commissioners
- 4) City of Valdosta
- 5) Lanier County Board of Commissioners

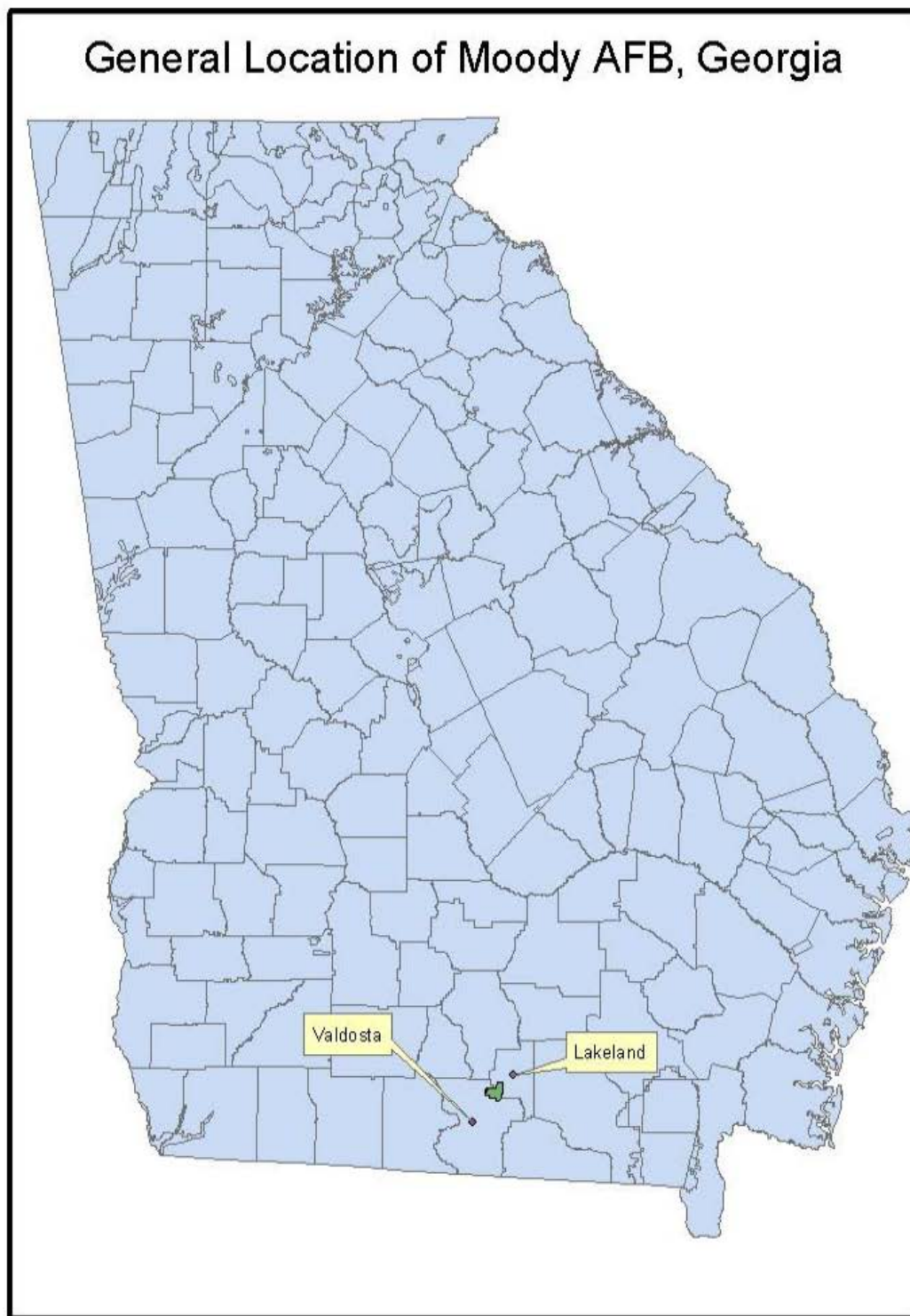
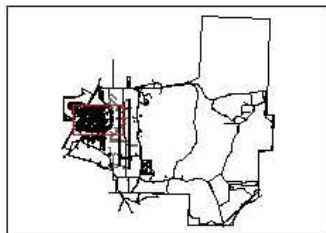
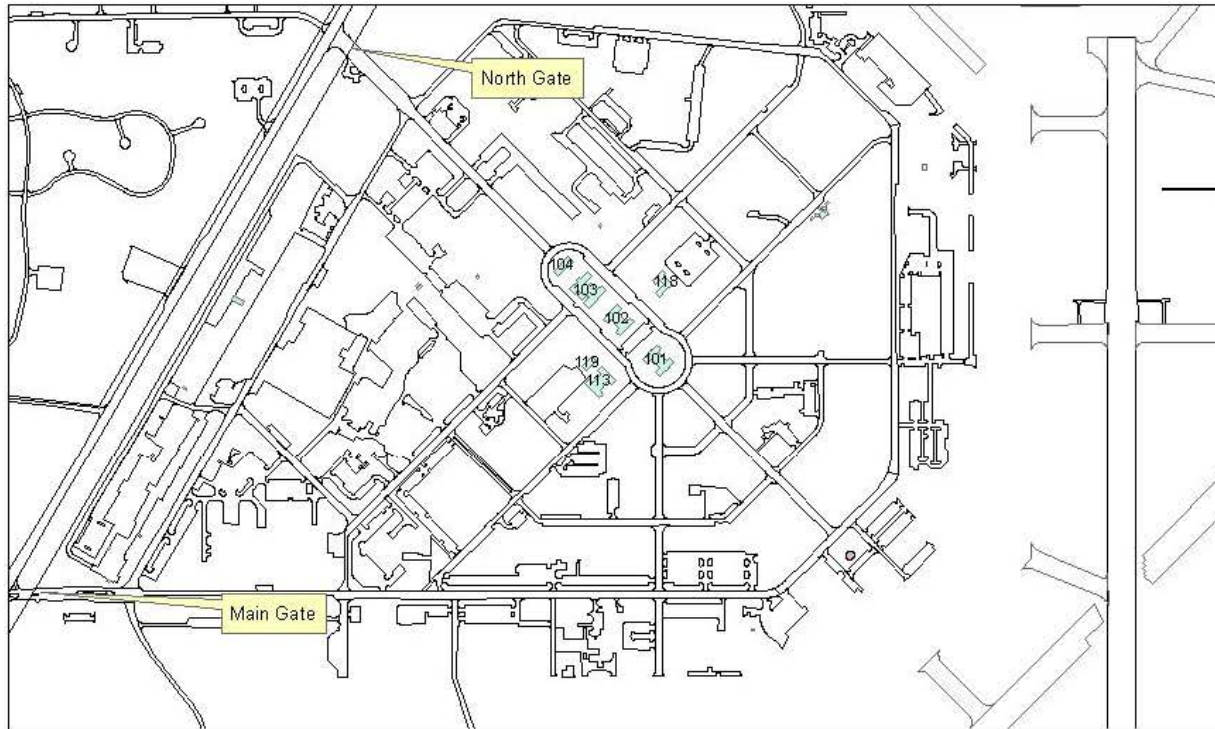


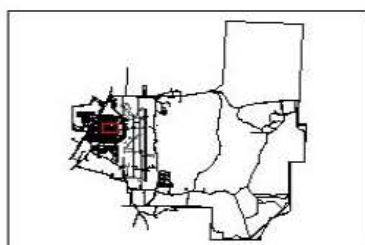
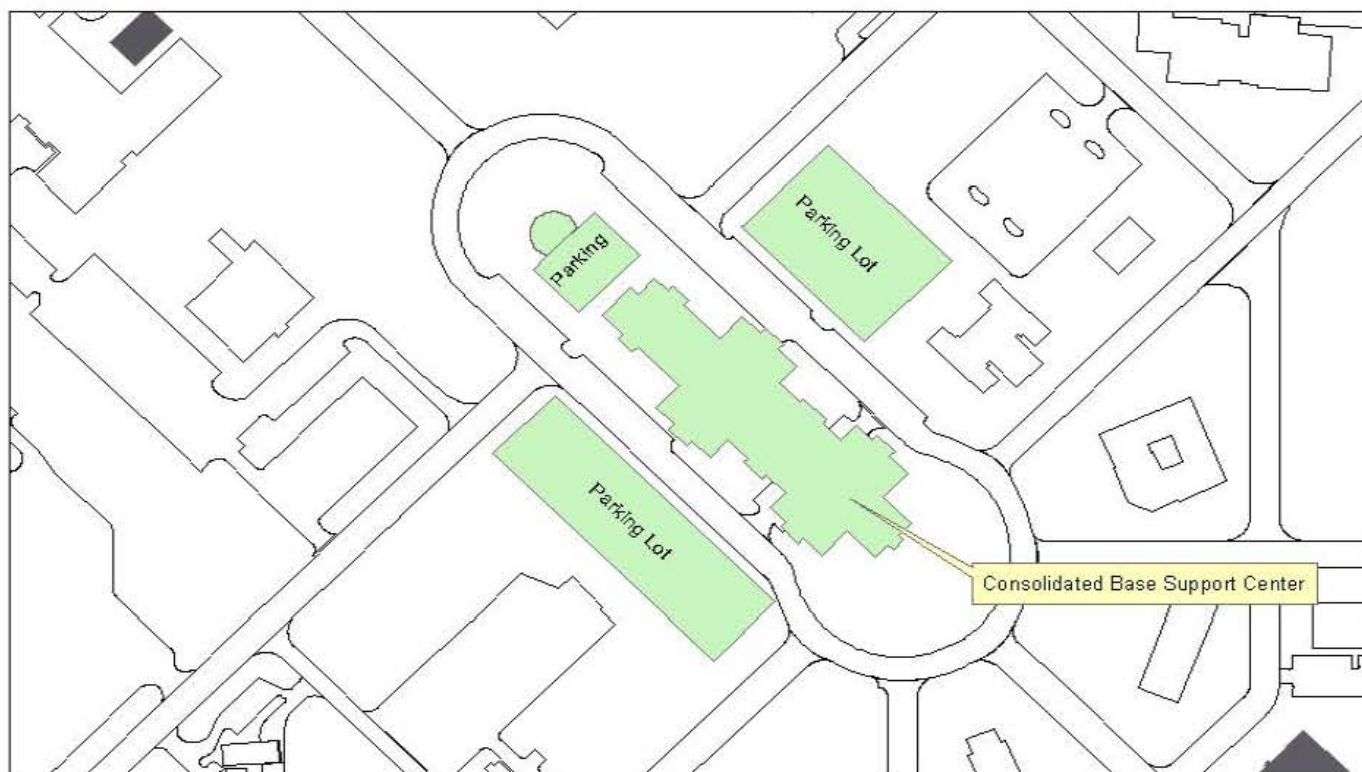
Figure 1



**Facilities Proposed for Demolition  
Construct Consolidated Support Center Project**

1,400 700 0 1,400 Feet





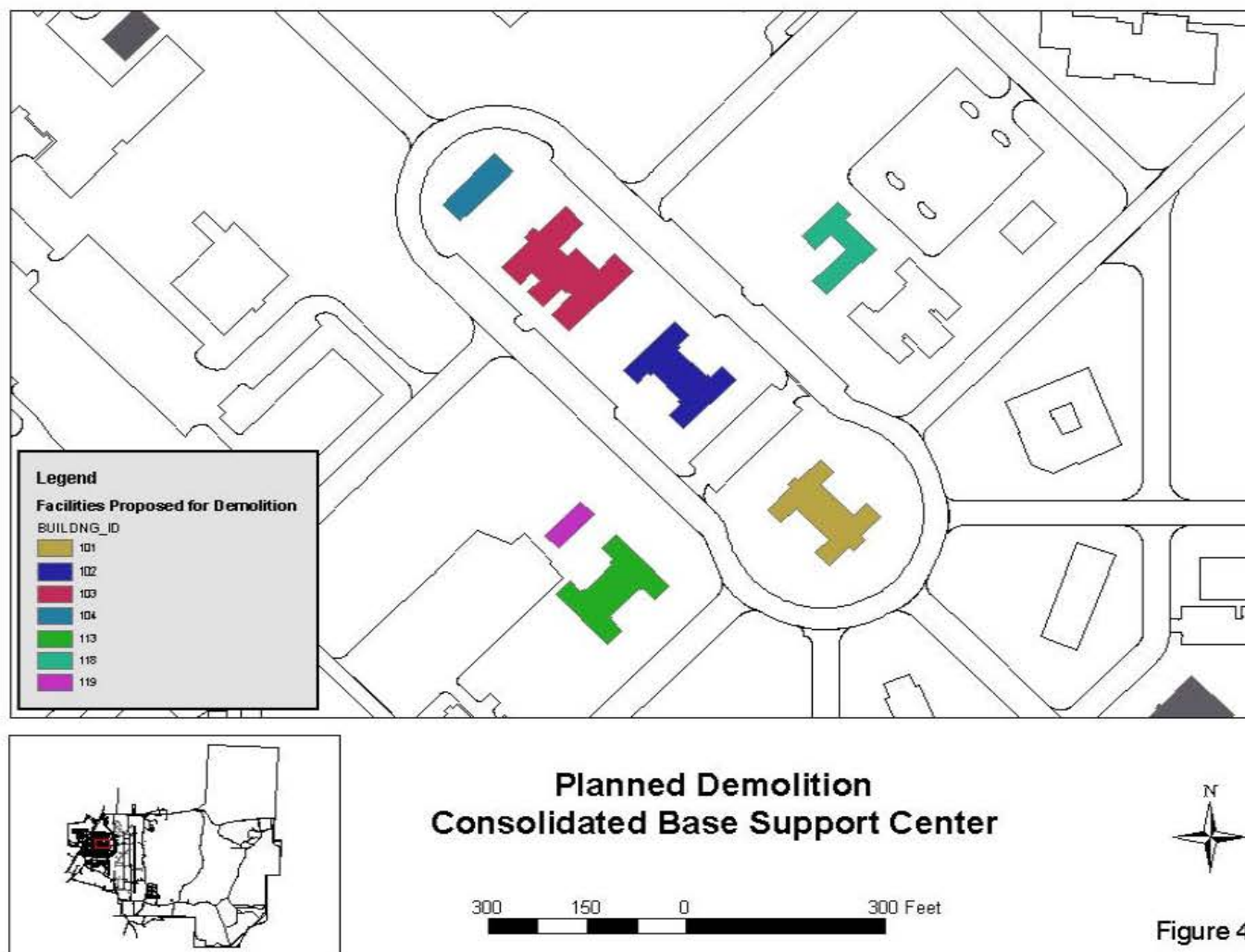
**Planned Construction  
Consolidated Base Support Center**

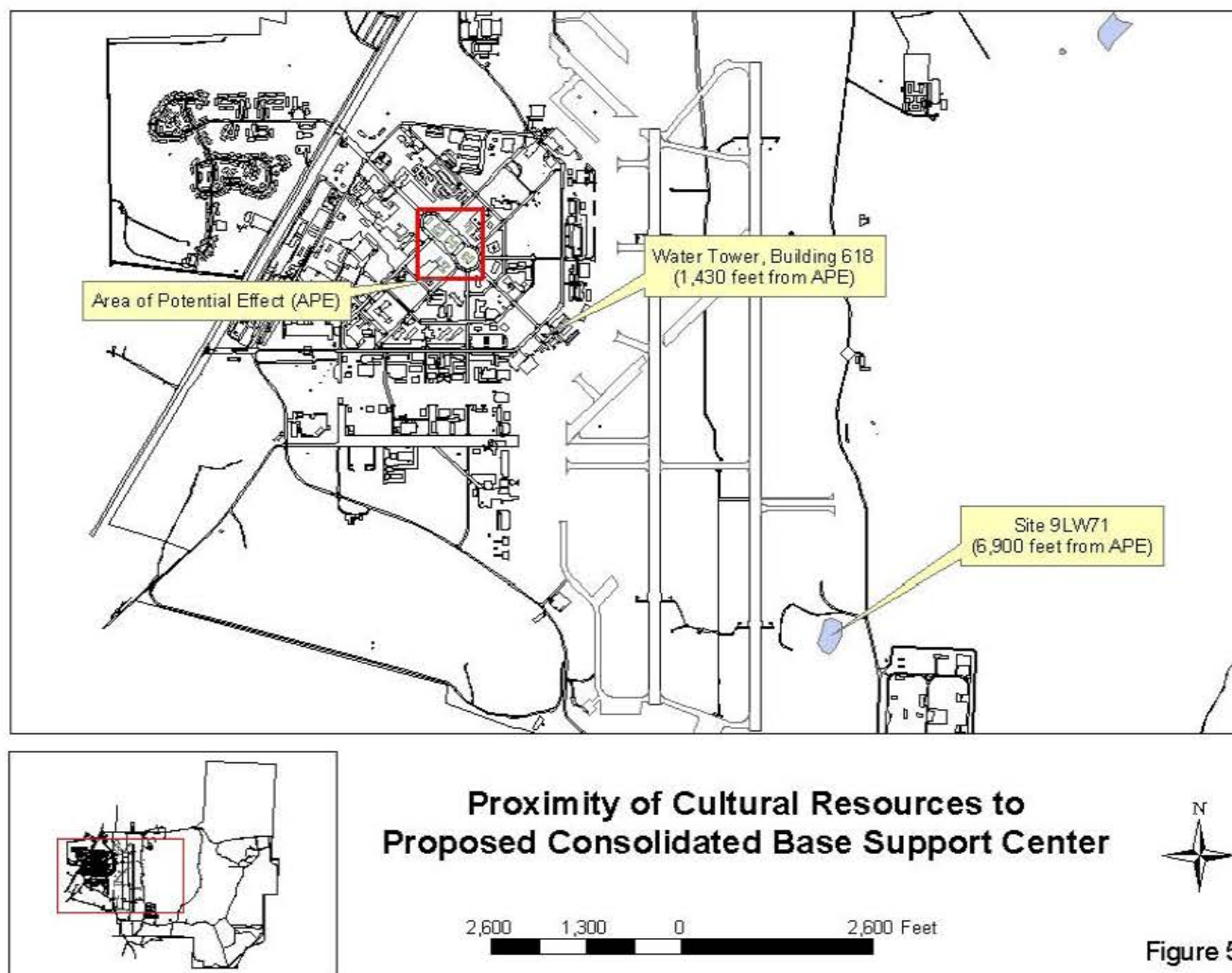
300 150 0 300 Feet

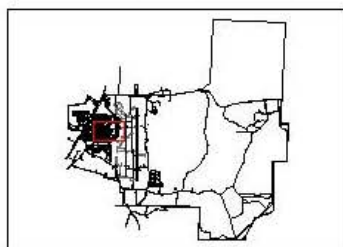
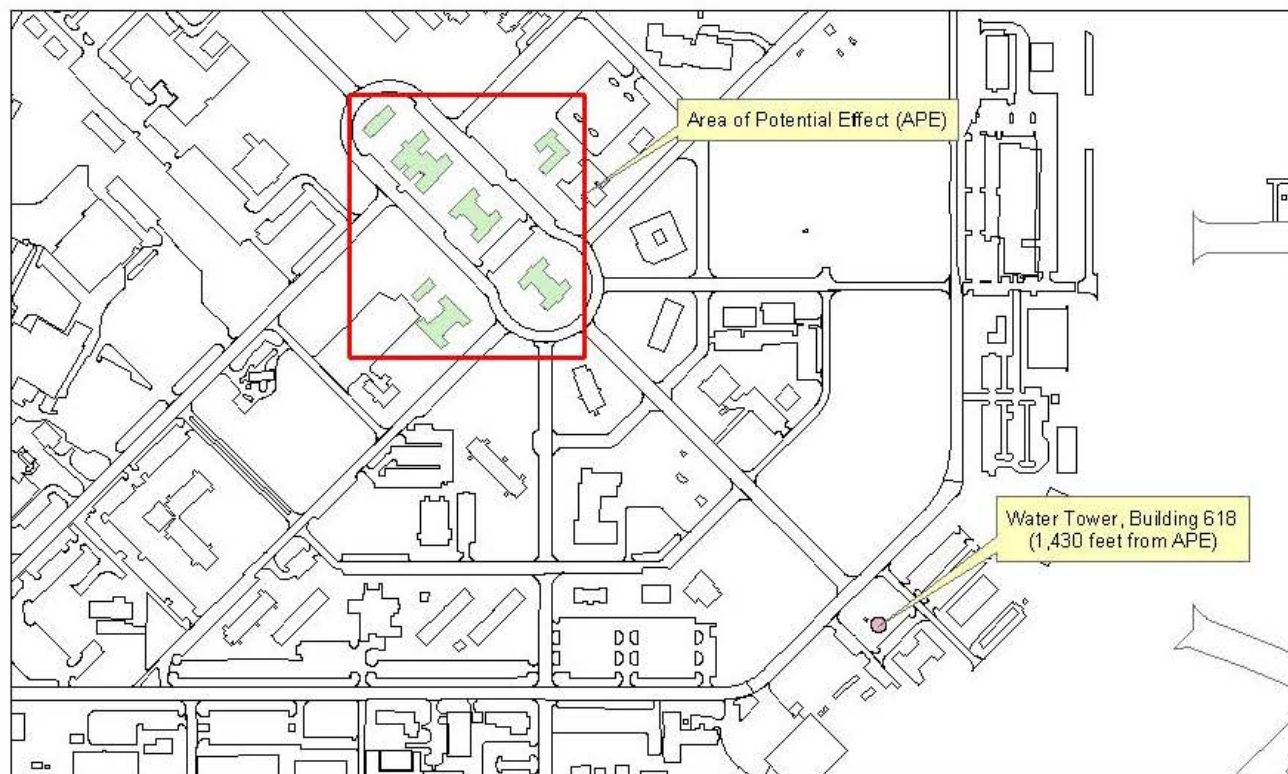


**Figure 3**







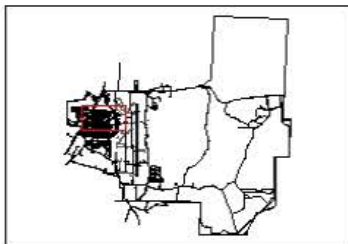
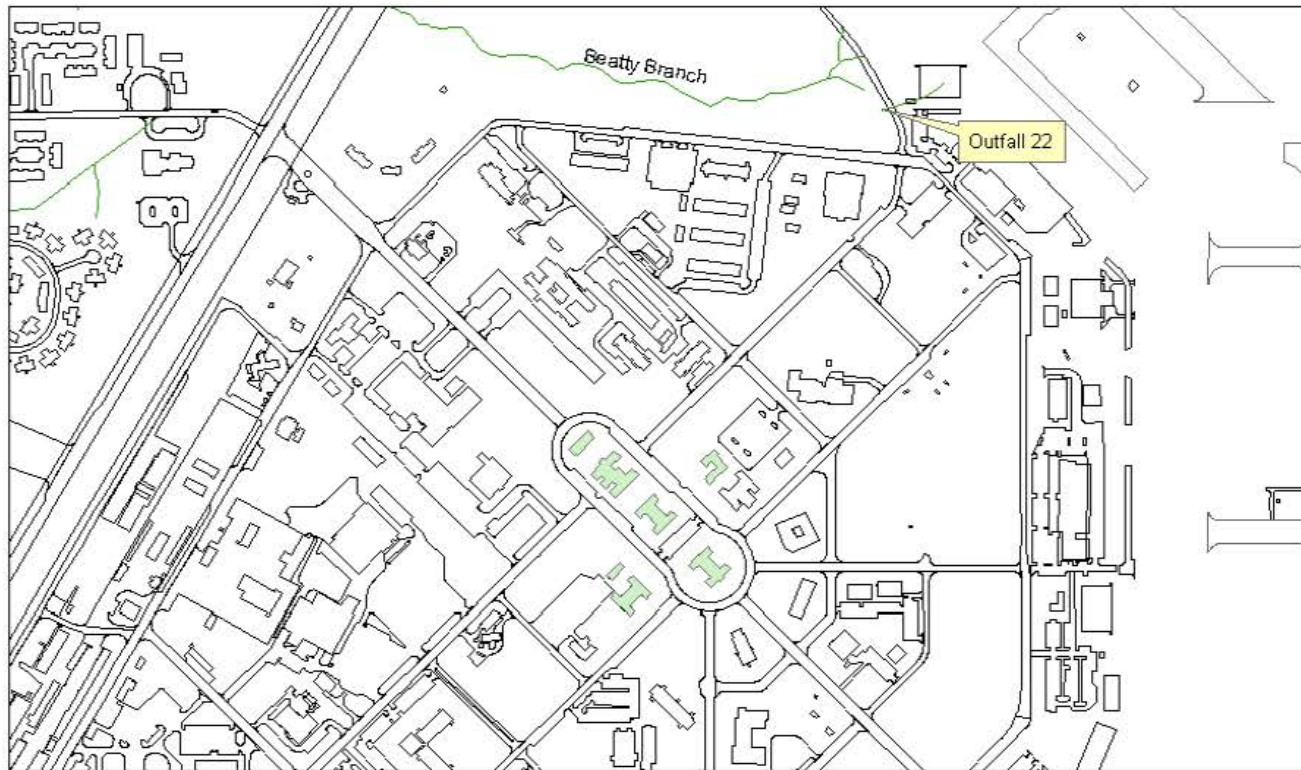


### Proximity of Water Tower to Proposed Consolidated Base Support Center

600 300 0 600 Feet



Figure 6



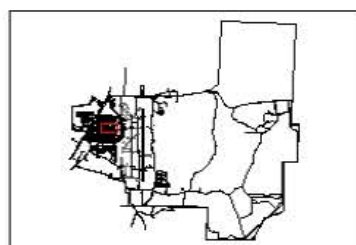
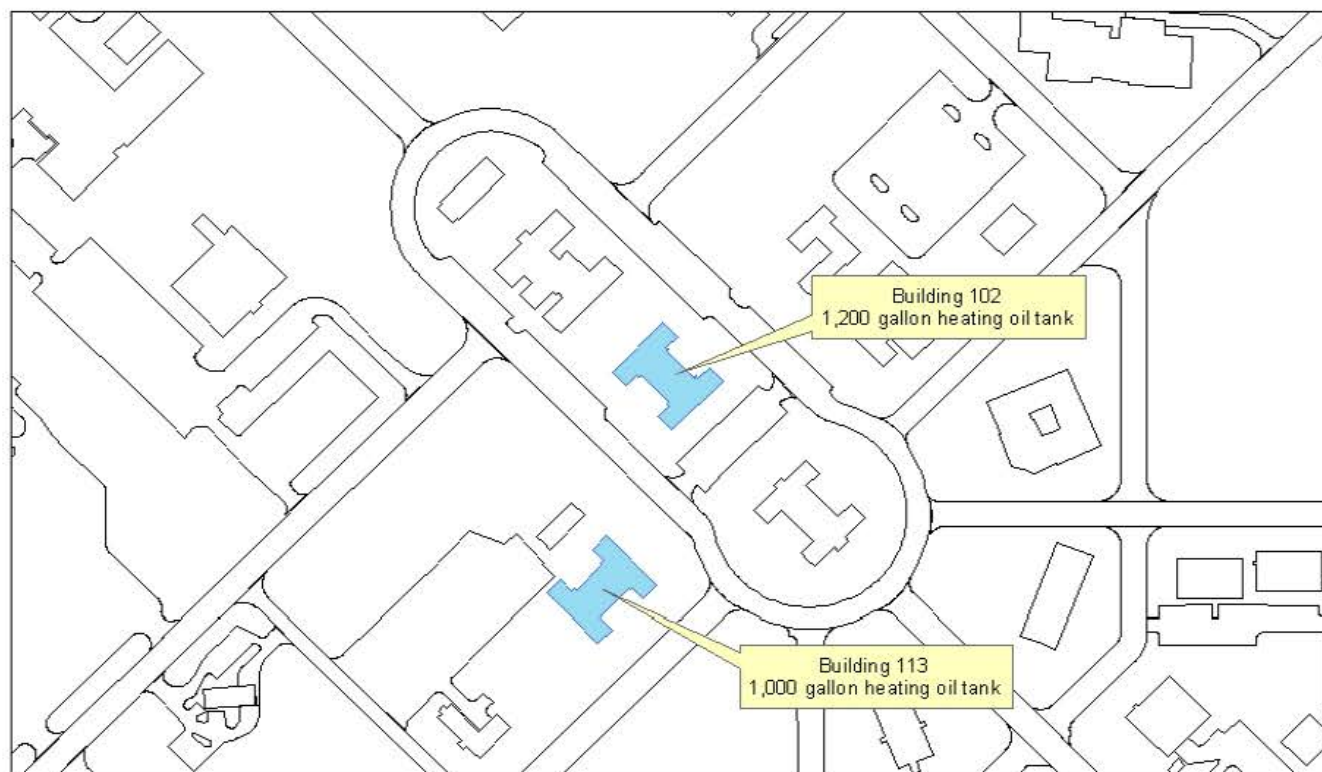
**Water Resources Relative to  
Proposed Consolidated Base Support Center**

820 410 0 820 Feet



**Figure 7**





**Facilities with Associated Underground Storage Tanks  
Proposed Consolidated Base Support Center**

310 155 0 310 Feet



**Figure 8**